

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Jennifer Hough,

Plaintiff,

-against

Onika Tanya Maraj, AKA (“Nicki Minaj”)
an individual,
Kenneth Petty, AKA (“Zoo”),
an individual

Defendants.

**AFFIRMATION IN SUPPORT OF
REQUEST FOR
CERTIFICATE OF DEFAULT**

Civil Action No. 21-cv-4568

Tyrone A. Blackburn, Esq., an attorney duly admitted to practice law before this Court and in the Courts of the State of New York, affirms the following under the penalties of perjury:

1. I am the founding attorney with T. A. Blackburn Law, PLLC., attorney for Plaintiff Jennifer Hough. As such, I am thoroughly familiar with the facts and circumstances of this action, based on the contents of the file maintained in this office.
2. This action was commenced according to Section 208 of New York civil practice law § 214-g, the New York State Human Rights Law, NY. Exec. Law § 290, *et seq.* (“NYSHRL”); and the New York City Human Rights Law, NYC Admin. Code § 8-101, *et seq.* (“NYCHRL”), 28 USC § 1367(a), California Code of Civ. Proc., § 527.6, including applicable liquidated damages, interest, attorneys' fees, and costs.
3. The time for defendants Onika Tanya Maraj and Kenneth Petty to answer or otherwise move concerning the complaint herein has expired.
4. Defendant Onika Tanya Maraj and Defendant Kenneth Petty have not answered or otherwise moved concerning the complaint. The time for Defendant Onika Tanya Maraj and Defendant Kenneth Petty to answer or otherwise move has not been extended.
5. Defendant Onika Tanya Maraj and Defendant Kenneth Petty are not infants or incompetent. Defendant Onika Tanya Maraj and Defendant Kenneth Petty are not presently in the United States military service, as appears from the facts in this litigation.

6. Defendant's Onika Tanya Maraj and Defendant Kenneth Petty are indebted to Plaintiff, Jennifer Hough in the following manner:

On September 16, 1994, Kenneth Petty kidnapped and violently raped Ms. Hough by knifepoint. Within hours of raping Ms. Hough, Kenneth Petty was arrested and charged with rape. In 1995 Kenneth Petty pled guilty to attempted rape and subsequently served over four years in prison. Shortly after his release from prison, Kenneth Petty intentionally murdered Lamont Robinson. He was arrested and charged with second-degree murder and later pled guilty to first-degree manslaughter.

As part of his 1995 plead deal for raping Ms. Hough, Kenneth Petty was required to register as a sex offender and did so consistently until on or about 2019, when he began dating Defendant Nicki Minaj. After intentionally failing to register as a sex offender, Kenneth Petty violated the Federal sex offender registration and notification act (SORNA). On August 6, 2021, Kenneth Petty accepted a plea deal for his SORNA violation in the Central District of California.

While facing criminal charges for violating SORNA, Kenneth Petty, Nicki Minaj, and their associates embarked on a relentless campaign of bribery, intimidation, harassment, and stalking of Ms. Hough and her family. As detailed in the amended complaint, Ms. Hough has suffered immensely.

As a result of Defendants' unsolicited calls, contacts, and communications, Ms. Hough began having nightmares. The memories began to flood back from the day of her rape. She began to experience anger, pain, sorrow, anxiety, and trust issues. This led to Ms. Hough suffering from crying fits and thoughts of paranoia.

At the end of May 2020, Ms. Hough received a call from her brother speaking frantically. The brother warned that Defendants knew where Ms. Hough lived and what her daughter does. They threatened to have someone show up at the Hough's house if she did not recant her 1994 rape claim.

After receiving this threat, Ms. Hough moved in June of 2020. She changed her phone number, registering her new number under her husband's name. These efforts by Ms. Hough were unsuccessful in curbing the harassment and unwanted contact. Shortly after changing her number, Ms. Hough was contacted by a lawyer instructed to reach out to her by Nicki Minaj.

Ms. Hough became so paranoid that she moved again in August 2020.

Kenneth Petty is indebted to Ms. Hough for the rape he visited upon her in 1994. Kenneth Petty's rape violated New York Penal Law § 130.35(1). Additionally, Kenneth Petty is indebted to Ms. Hough for the assault and battery he visited upon her while engaging in the acts of kidnapping and raping her. Kenneth Petty is indebted to Ms. Hough for intentional infliction of emotional distress for the mental anguish she suffered because of the 1994 kidnapping and rape he visited upon her. Kenneth Petty is indebted to Ms. Hough for the stalking, harassment, bribery, and witness intimidation his associates visited upon her in 2020.

Nicki Minaj is indebted to Ms. Hough for the harassment, stalking, bribery, and witness intimidation she and her associates visited upon Ms. Hough in 2020.

7. The damages include, among other things, the following:

Ms. Hough is requesting an award of damages of twenty million dollars. Considering Kenneth Petty's 1994 kidnapping and rape of Ms. Hough, coupled with Defendant's harassment, bribery, stalking, and witness intimidation, Ms. Hough must be compensated for the hell that was visited upon her by the Defendants. Ms. Hough has been robbed of living a normal life. She has suffered immense mental and physical anguish. She lost her job and has moved into hiding because of the death threat Nicki Minaj and Kenneth Petty's associate directed towards Ms. Hough on behalf of the Defendant's. Additionally, Ms.

Hough is entitled to an award of costs and expenses together with reasonable attorneys' fees.

WHEREFORE, Plaintiff Jennifer Hough requests that the default of Defendant's Onika Tanya Maraj and Kenneth Petty be noted, and a certificate of default issued.

I declare under penalty of perjury that the preceding is true and accurate to the best of my knowledge, information, and belief, that the amount claimed is justly due to Plaintiff, and that no part thereof has been paid.

October 11, 2021

By: Tyrone A. Blackburn, Esq.
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